INSTRUCTIONS TO COMPLETE UIPA RECORD REQUEST LOG
(December 2013)

HOW HAS THE LOG BEEN REVISED?

The UIPA Record Request Log has been revised, **for use beginning immediately.** These instructions and OIP's training materials have been updated to reflect the revisions.

The **main changes** since July 2013 are the addition of 16 columns at the far right of the Log, which **require no data entry by agencies and will automatically calculate** more detailed statistics for better understanding and management of how much is being charged and how long agencies are taking to respond to various types of record requests. **Data for all record requests is being differentiated between complex, noncomplex (not including personal record requests), and personal record requests**. Because complex cases usually involved more time and expense, new Columns AL through AO now automatically calculate total **fees and costs for complex cases** only. New Columns AP through AS automatically input the **number of workdays to complete all, complex, noncomplex, and personal record requests.** New Columns AT through AW automatically calculate the **number of search hours** to complete these various types of requests, and Columns AX through BA calculate the **number of review and segregation hours**.

While the yellow highlighted "Totals" row 10 sums the data entered in each column by the agency, **a new orange row 11 has been created to automatically calculate the agency's "Averages" for selected columns.** After the yellow "Totals" row is semiannually uploaded by each agency onto the Master Log at data.hawaii.gov, OIP will be able to create department-wide and State-wide averages, which each agency can compare to its own "Averages" that will be calculated on its Log.

A new row in light blue has been added with short descriptions of what is being calculated in each "Totals" cell below it, and instructions may pop-up in the blue cells to describe the "Totals" or "Averages" in greater detail. Additionally, some of the headings and formulas have been changed. The most notable formula change is that cell N11 in the "Totals" row now calculates the total number of days for completion rather than the median day.

From the agency's perspective, the biggest changes in entering data take place in just three columns. In order to distinguish between complex and noncomplex requests, agencies now need to enter an "x" (instead of dates) in **Column K** to identify a complex request, and also in **Column L** to indicate whether incremental responses were provided for a complex request. **Column I** has also been changed so that the agency must manually add an "x" if, within 10 work days, it sent an "initial response," which can be a notice, acknowledgment, or completion of the case.

Finally, there are **two Excel worksheets**: (1) the **Sample Log** for agency practice and training, which includes the highlighted Examples showing how to properly enter data and includes improperly entered data in the white rows; and (2) the **UIPA Record Request Log form** for the agencies to use, which has been shortened to not show the four highlighted Examples so that it will be easier for agencies to enter data in the white rows, beginning in row 12.

WHEN DOES THE LOG TAKE EFFECT?

This revised Log must be used by January 1, 2014, but the agency may begin using it immediately and transfer its data for the first part of FY 2014 onto the new Log. Because the changes in data entry are minimal, the agency can simply copy the data from its current Log for FY 2014 onto the new Log. If the agency sent an initial response within 10 days of receiving the request, then it must enter an "x" in Column I. If there were any complex requests, then the agency can simply replace any dates in Columns K and L with a single "x" per affected column. Agencies do not need to go back and correct their entries in other columns. **After modifying, if necessary, and transferring the old data, please enter the yellow highlighted "Totals" (row 11) from the revised Log onto your department's Log for uploading onto the Master Log at data.hawaii.gov by January 31, 2014.** See directions below on how to copy the data.

DOES THE AGENCY HAVE TO FILL OUT THE ENTIRE LOG?

No. Although the Log looks long and intimidating, it actually consists of only **four main parts: (1) identification** of requests; **(2) resolution** of requests; **(3) fees and costs** to respond to requests; and **(4) time to respond** to record requests. Most of the columns are either automatically entered for you or may not need to be filled out, which is why they have been highlighted. **It may only be necessary for the agency to enter data in as little as 12 of the 53 columns, and no data is entered by the agency after Column AH.**

Based on the agency's data entries, the Log will automatically calculate how much an agency can charge for a record request and provide other information to help the agency, OIP, and the public better understand how well the agency is meeting its UIPA responsibilities and where improvements, if necessary, could be made. The main thing for an agency to remember, however, is that the **Log's calculations are only as good as the data the agency properly inputs.**

WHAT RECORD REQUESTS ARE COVERED BY THIS LOG?

This log applies only to **written** (including e-mailed) **requests** purportedly made under Hawaii's Uniform Information Practices Act (UIPA), **in which the agency sent out the "Notice to Requester."** Requests for government records under Part II of the UIPA and for personal records under Part III of the UIPA should be logged. (See instructions for search, review, and segregation fees for a description of "personal records.") Requests may be for records in physical forms other than paper, such as electronic records or tape recordings.

This log ***does not apply to subpoenas*** for discovery of records in court cases. It also ***does not apply to routine requests***, such as requests for UH transcripts or DOH vital records, ***where the agency has established a fee schedule and the UIPA Notice to Requester is not sent***. **The agency is expected to track, on its own, the number of routine requests that it receives and the department will report the total number when the Log is uploaded onto data.hawaii.gov twice a year.** While the agency may choose to use a separate Log or a variation of the Log to help it keep track of routine requests for which no "Notice to Requester" is sent, it should merely report its total number of routine requests to the department, which will then add all agencies' totals to manually add the overall number of routine requests to the department's semiannual reports that are uploaded onto the Master Log at data.hawaii.gov. If the department uploads the entire Log summary (*i.e.*, the yellow highlighted "Totals" row) for routine requests onto the Master Log, it will skew the results.

WHAT "AGENCY" MUST USE THIS LOG?

"Agency" as used in this Log is based on the UIPA definition of "any unit of government" at the state or county level, such as a department, institution, board, commission, division, program, council, bureau, office, etc. Although the Judiciary is participating with respect to its administrative functions, the Log is not applicable to the nonadministrative functions of the courts.

CAN THE LOG BE ALTERED?

If agencies want to collect additional data or modify the Log in any way, please do so by altering only Columns C, D, or E. **If agencies alter anything from Column F on, they risk adversely affecting the Log's formulas and drop-down menus, and the data they upload to data.hawaii.gov may not align with the Master Log and may produce incorrect results.**

HOW AND WHEN WILL THIS LOG BE REPORTED?

Twice a year, the agency should make an electronic copy of its Log and upload the totals onto its department's Log, which will then be uploaded onto the UIPA Master Record Request Log at data.hawaii.gov. Each department must then upload its agencies' totals onto the Master Log at data.hawaii.gov twice a year: (1) **by January 31**, to cover requests received during the semi-annual period from July 1 through December 31, and (2) **by August 30,** to cover requests received during the entire prior fiscal year from July 1 through June 30. The extra time to report the fiscal year-end totals should give the agencies enough time to enter completion data for requests received through June 30 of the prior fiscal year.

The agency should start a new Log each July 1 for requests received when the new fiscal year begins. Because all requests will not be completed in the same fiscal year they were made, agencies will be using two Logs when one fiscal year ends and the other begins.

There are separate instructions on how agency employees with the proper credentials will upload the agency's Log totals onto the **OIP's Master UIPA Records Request Log on data.hawaii.gov**. After your agency's Log totals are published on data.hawaii.gov, they may be summarized with the results from the other agencies within your department or by all departments, and used to create various reports in the form of charts, maps, graphs, or other visualizations.

Your agency's uploading of data onto to the Master Log on data.hawaii.gov will replace the annual Report of Statistical Information that agencies formerly filed with OIP. Obviously, this Log also replaces the log formerly found in OIP's Records Report System materials.

If you have any questions about the Log, please check OIP's training page at oip.hawaii.gov, call OIP at (808) 586-1400, or email oip@hawaii.gov. If you need passwords to access data.hawaii.gov, please call the Office of Information Management and Technology (OIMT), Debra Gagne, (808) 586-1930, ext. 534.

HOW CAN I PRINT OUT A COPY OF THE LOG?

Given the length of the Log, agencies may want to print a paper copy of it in sections or parts on more than one sheet of paper as follows:

1. Left click and highlight the columns and rows that you want to print on a page.

2. Left click on "Page Layout" on your ribbon.

3. Look for "Page Setup" and click on the button on the right, which will open up four tabs: Page, Margins, Header/Footer, Sheet.

4. In the "Page" tab, under "Orientation," select "Landscape." Under "Scaling," select "Fit to: 1 page wide by 1 page tall." Under "Page Size," select the size of the paper that you want to use. Then hit the "Print Preview" button at the bottom to see how the printed page will look.

5. Print the page. If you want to print additional sections/parts of the Log, then go back to Step 1.

HOW CAN I COPY AND PASTE DATA FROM THE OLD LOG INTO THE REVISED LOG FOR FY 2014?

Data entered in the white rows of your old Log can be entered into the corresponding white rows of the revised Log for FY 2014, which must be done in four increments. The reason that you cannot simply transfer all data at one time is because there are highlighted columns between the data entries whose formulas are protected so that data in those columns will not transfer and you will get an error message. Therefore, the data transfer has to be done in four increments as follows:

1. Open up your old Log and the new Log for FY 2014.

2. Left click and highlight the **data from the white rows** of Columns D through M on your old log; blinking lines will define the area being copied. Be sure to <u>not</u> copy any of the highlighted areas of your old Log.

3. Go to the new Log and left click in the top left cell of the area where you will be adding the old data (e.g., cell D12 when transferring data from Columns D through M), then hit **"Paste Special."**

4. When the Paste Special box opens up, select in the "Paste" section **"Values and number formats"** then hit **"OK"** at the bottom. (This will add the old data, but not any old formulas or formatting, to the new Log.) Hit the **"Esc"** button on the top left of your keyboard to stop the lights from blinking around your old data in your old Log.

5. Follow the same process three more times, for (1) Columns O through X, (2) Columns AA through AC, and (3) Columns AF through AH. Be careful not to include any highlighted columns from your old Log. When you are done copying the old data to your new Log, name and save your revised Log.

Once you have finished entering the data onto the revised Log, remember to make the following **modifications**:

1. If the agency sent an initial response within 10 days of receiving the request, then you must manually enter an "x" in **Column I**. See instructions for Column I.

2. If there were any complex requests, then the agency can simply replace any dates in **Columns K and L** with a single "x" per affected column. See instructions for Columns K and L.

Agencies do not need to go back and correct their entries in other columns, unless there are errors, such as where a fee waiver for a personal records request was entered in a purple highlighted cell in Column AB or AC. If a comma was entered instead of a period for a decimal number in Columns V through X, then the error message #VALUE! will appear.

WHAT DO EACH OF THE DIFFERENT SECTIONS AND COLUMNS MEAN AND HOW SHOULD THE LOG BE FILLED OUT?

The Log consists of **four main parts: (1) identification** of requests; **(2) resolution** of requests; **(3) fees and costs** to respond to requests; and **(4) time to respond** to record requests. Most of the Log's 53 columns are either automatically entered for you (which is why they are highlighted) or they may be left blank. The agency may need to enter data in as few as 12 columns, but it is **very important to enter the data properly.** It is not necessary to enter any data in any highlighted columns or after Column AH, as the remaining 19 columns of data are automatically generated.

PART 1: IDENTIFICATION OF REQUESTS

DEPARTMENT/AGENCY: It is important for the first person starting the agency's Log to follow the naming protocol identifying "state or county/department/agency name" in this section so that data can later be properly sorted, filtered, searched, and found on data.hawaii.gov. **Once Columns A and B have been entered to identify which department and agency the Log belongs to, no further entries in these columns are required.**

Column A, Department: Please select your specific department from the drop-down list, which can be accessed by hitting the arrow that will appear in the bottom right corner of the "Department" cell A3. The department will be automatically entered in the "Department" cell A3 and in the row with the yellow highlighted totals. The remaining rows in this column are highlighted in blue because no further entry is required.

Column B, Agency: After entering the department, please select your specific agency from the drop-down list, which can be accessed by hitting the arrow that will appear in the bottom right corner of the "Agency" cell B3. (If the agency drop-down menu does not appear, it is because the department was not entered in cell A3.) The agency name will be automatically entered in the "Agency" cell B3 and in the row with the yellow highlighted totals. The remaining rows in this column are highlighted in blue because no further entry is required. If your agency is not on the drop-down list, please contact OIP at 586-1400 or email oip@hawaii.gov.

ALL WRITTEN REQUESTS: For all **written** record requests, the agency should input the data into this section to help identify and track the requests. **Routine requests that are subject to the agency's set fees** (*e.g.,* birth certificates, UH transcripts), **or if no Notice to Requester is sent, should not be tracked on the same Log that will be uploaded onto the Master Log** at data.hawaii.gov. Instead, the **agency must separately keep track of the total number of routine requests** it receives (and not skew the results by reporting the various "Totals" that are calculated in the yellow highlighted row of the Log). When the department's UIPA Log is semiannually uploaded onto the Master Log at data.hawaii.gov, then the person doing the uploading will manually input the total number of routine requests received by all agencies within the department.

This section of the Log helps to identify each record request, distinguish between personal records requests and complex requests, and provide dates when requests were received and the agency initially responded to them.

Column C, Numbers: These sequential numbers identify the number of record requests received by an agency (and are not the row numbers in Excel). If your agency has more than 1,000 record requests in a fiscal year, please contact OIP for help in adding new rows to your Log.

As record requester's names are added in Column D, they will be totaled in the yellow highlighted cell C10 above the Column C entries, and this total should match the total number of requests that will be calculated and highlighted in yellow in Column G cell G10. Note, however, that whenever you add or delete a row from the Log, the record request numbers in Column C will not adjust, so the total number calculated in cell C10 may not match the Column C number of the last record request.

Column D, Requester Name or File Number: Enter a brief description to help the agency identify the specific record request, in case questions arise later. This identifying information will be redacted before uploading the agency's totals onto data.hawaii.gov.

Note, however, that if the Log itself must be produced in response to a records request, the requester's name is generally not considered confidential information and should not be redacted, except possibly for personal records requesters' names. *See* OIP Op. Ltr. No. 90-37, or contact OIP for guidance regarding redactions.

Column E, Employee ID: This column is for the name, initials, or employee number of the agency employee who is responsible for resolving the records request, and will be redacted before it is uploaded onto data.hawaii.gov.

Column F, Personal Records Request?: Enter only one "x" per cell **if the request was, in whole or in part, a personal record request seeking the requester's own personal information** that is readily accessible in a file or location with the requester's name or identifying information. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total. The "total" cell highlighted in yellow (cell F10) will count the number of personal record requests received by the agency. It is very important to properly identify and enter a personal record request because different calculations depend on Column F's data to determine the allowable charges for a request.

A "personal record" is a government record containing information "about" the individual who is requesting the record, such as the person's educational, financial, personnel, or medical records, or files or reports that reference the person by name.

Keep in mind that NOT every request for personal records would be considered a personal record request under Part III of the UIPA. For example, it is NOT a personal records request if the requester seeks records "about" him or her, but the records are not readily accessible because it would require the agency to search through various files not solely dedicated to the requester, *e.g.,* a request for "any of the records in the agency's possession naming me, John Doe." Also, a request for an unrelated person's personal records is NOT a personal records request, *e.g.,* an unrelated third party's request for President Obama's birth certificate. Instead, these are examples of government record requests subject to Part II of the UIPA, which have different rights and liabilities than Part III personal record requests.

Note, too, that a request may be a government record request in part as well as a personal record request as to other portions of it, so that both Parts II and III of the UIPA are implicated. For more information regarding Part III personal record requests and how they differ from Part II government record requests, please check out the UIPA Guide and additional guidance for responding to personal record requests on OIP's training page at hawaii.gov/oip.

Column G, Date Agency Received Request: Enter the month, day, and year that the agency received a written, faxed, or electronic (e-mailed) request for a record. These dates will help the agency to keep track of a request. Although entered by the agency as dates, the yellow highlighted "Totals" cell G10 above the agency's data entries will count the number of record requests received by the agency, which should match with the total number in Column C (cell C10). Be sure to enter only one date per request, so that it will be counted in the "Totals" cell G10.

Column H, Date Agency's Notice Was Sent: Enter the month, day, and year of that the agency sent its **Notice** to the requester. Be sure to enter only one date per request, so that it will be counted in the yellow highlighted "Totals" cell H10.

The Notice must normally be sent within 10 work days of receiving the request. (If agency does not have a Notice form, a model form is available in appendix of OIP's Open Records Guide to Hawaii's Uniform Information Practices Act or on "Forms" page of OIP's website at oip.hawaii.gov.)

If this is a complex request with extenuating circumstances, then the agency may instead send, within 10 work days of receiving the request, an Acknowledgment to Requester. **The agency must still sent a Notice to Requester within 20 days of receiving the complex request. Enter the date that the agency sent its Notice, not the Acknowledgment.**

The "total" cell highlighted in yellow (cell H10) above the agency's data entries will count the number of notices (and not acknowledgments) sent to requesters, and will be reported on data.hawaii.gov.

Column I, Agency's Initial Response Sent Within 10 Work Days?: Enter only one "x" **if the agency sent a Notice** to Requester (Column H), the **Acknowledgment** (for complex cases as identified in Column K), **or completed the case within 10 work days** (excluding weekends and holidays) after receiving the request. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total.

Do not count the day that the request was received, but count the day that the response was sent in determining whether Column I should be checked.

For many typical requests, an agency may complete the case by sending the requested record within 10 days and without sending a Notice or Acknowledgment to the requester. Column N calculates the number of workdays to complete a request, but adds one more day than Column I because Column N includes the day that the request was received. Therefore, **if Column N shows that the case was completed in 11 days or less, then Column I can also be checked.**

A case, especially a complex request, may take longer than 11 days to complete, but Column I should still be checked if the Notice or Acknowledgment was sent within 10 days after receiving the request.

Column J, Request Needed Initial Clarification: Enter only one "x" if the agency sought **initial** clarification from the requester regarding the request. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total. **Note that even if the request needs clarification before the agency can respond, the UIPA Notice to Requester should still be sent to the requester within ten work days** (excluding weekends and holidays, and excluding complex cases) of receiving the request. The Notice to Requester form has a box to check when the "Agency needs a further description or clarification of the records requested" and also has a space for the agency to describe the information that it needs from the requester. If the requester fails to clarify the request within 20 work days of the agency's Notice, then the request may be deemed abandoned (see Column T).

COMPLEX REQUESTS (EXTENUATING CIRCUMSTANCES): This section helps the agency to keep track of the number and status of particularly large or complex record requests. For the procedural requirements in handling such requests, please review "OIP's Informal Guide to Processing Large or Complex Record Requests" and "QUICK REVIEW: Requester has Responsibilities and Requirements Before an Agency Must Provide Records," which can be found on OIP's training page at oip.hawaii.gov.

Due to extenuating circumstances or voluminous requests that prevent an agency from responding within the normal ten-day time limit to respond to a UIPA request, an agency may initially send an Acknowledgment instead of a Notice. A model Acknowledgment form is available in appendix of OIP's Open Records Guide to Hawaii's Uniform Information Practices Act or on the "Forms" page of OIP's website at oip.hawaii.gov. **Either the Notice**

or an Acknowledgment must be sent within ten business days of receiving the request. If the agency initially sends an Acknowledgment, it will have an additional ten business days to send its Notice. (See Example 4.) **Keep in mind that the Acknowledgment does not replace the Notice; even though more time is allowed in complex cases, a Notice must be sent within 20 work days of receiving the complex request.**

<u>Column K, Complex Request?</u>: If this is a **complex record request** involving extenuating circumstances or voluminous records, please enter one "x" in Column K. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total.

It is very important for the agency to properly identify complex record requests, so that the Log can distinguish them from the more typical record requests and perform the correct calculations.

The "total" cell highlighted in yellow (cell K10) provides the total number of complex requests received by the agency.

<u>Column L, Dates of Agency's Incremental Responses</u>: If this is a **complex record request in which incremental responses** were sent to the requester, please enter one "x" in Column K. Improperly entering more than one "x" or another letter in the cell will result in the entry not being counted in the column total.

The "total" cell highlighted in yellow (cell L10) provides the total number of complex requests in which the agency sent out incremental responses. As cell L9 helps to explain, cell L10's total is <u>not</u> for the total number of incremental <u>responses</u>, but for the number of <u>requests</u> with incremental responses.

<u>PART 2: RESOLUTION OF REQUESTS</u>

FINAL RESOLUTION OF REQUESTS: This section records when and how requests are ultimately resolved. All of the totals in this section will be reported on data.hawaii.gov. **<u>There should be only one response in Columns O through T to explain how a request was finally resolved by the agency.</u> In addition to these columns, Column U may be checked if the agency learns that a lawsuit has been filed against it by a requester.**

<u>Column M, Date Completed</u>: Enter the month, day, and year that the agency provided or made the records available, or provided its final response to a requester, whichever comes first. **There should be only one completion date;** if the request has not been completed, then this cell should be left blank until it is done. If the agency sent a Notice explaining that it was **denying the request in whole or was unable to respond** to the request because the records were not maintained or a requested summary was not readily retrievable, then the Notice date is the completion date. If the agency sent a Notice stating that the request would be **denied in part or granted in full,** then the completion date (which may or may not coincide with the Notice date) is the date the records were mailed, emailed, or available for the requester to pick up at the agency, regardless of whether

payment was ultimately made or when the copies were actually made or whether records waiting for pickup were actually picked up.

For example, if the Notice informs the requester that the records are available to be picked up and copies have already been made or will be provided when the requester shows up, then the Notice date is the completion date. If the Notice required prepayment of estimated fees and costs, and the agency mailed or e-mailed the records to the requester after receiving that prepayment, the date the records were mailed or emailed would be the completion date. If the agency informed the requester that the records would be available for pickup or review as of a certain date (subsequent to the Notice date), then the specified date would be the completion date. If the Notice indicated that the records would be provided in increments, then the date that the final increment is mailed, e-mailed, or made available becomes the completion date.

If the agency simply provides all the requested records instead of sending a Notice, then the date the records were mailed, e-mailed, or otherwise provided to the requester is the completion date. If the **requester voluntarily withdraws** the request, then the withdrawal date is the completion date. If the agency sent a notice seeking initial clarification of the request or payment of fees and the requester does not respond within 20 business days, then the request may be presumed to be **abandoned** and completed on the day that the agency's notice was sent.

Although dates are being entered into Column M, the "total" number highlighted in yellow in cell M10 summarizes the number of requests completed by the agency.

Column N, Number of Workdays to Complete: This number is **automatically calculated** based on the number of workdays (excluding Saturday and Sunday, but including holidays) that it takes for the agency to fulfill each request, based on the agency's entries in Column G (date agency received request) and in Column M (date completed). There should be NO zeroes or negative numbers shown in Column N.

Based on the number of workdays that it took the agency to fulfill each request in Column N, the number highlighted in yellow in cell N10 then calculates the total number of days that the agency takes to complete all record requests. When the cell N10 number is divided by the number of completed requests in cell M10, then you should get the agency's "Average" number of days to complete each request, as shown in the orange row below (cell N11).

Columns O through T record how each request was ultimately resolved by the agency. For each request, only one of the cells in Columns O through T should be checked to indicate how the request was ultimately resolved by the agency. If the agency becomes aware of a lawsuit being filed regarding a request, then Column U can be checked in addition to one of the cells in Columns O through T.

Column O, Request Granted in Full?: Enter only one "x" if the request was granted in its entirety by the agency. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total.

<u>Column P, Request Denied in Full?</u>: Enter only one "x" if the request was denied in its entirety by the agency. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total.

Typically, a request will be denied in full if the agency claims a UIPA exception to disclosure or another statutory requirement for confidentiality. The agency should provide in its Notice to Requester a description of the records being withheld and the agency's justification and applicable statutes under which it claims an exception to disclosure. Keep in mind that the UIPA places on the agency the burden of justifying its denial.

<u>Column Q, Request Denied in Part?</u>: Enter only one "x" if access to all or part of the record was denied by the agency, *e.g.,* if part of the record had to be redacted or withheld. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total.

Typically, a request will be denied in part if the agency withholds or redacts something from the record provided to the requester because of a UIPA exception to disclosure or another statute's confidentiality requirement. The agency should provide in its Notice to Requester a description of the records being withheld and the agency's justification and applicable statutes under which it claims an exception to disclosure. Keep in mind that the UIPA places the burden on the agency to justify its redactions and nondisclosures.

<u>Column R, Agency Ultimately Unable to Respond?</u>: Enter only one "x" if the agency **ultimately** did not provide the requested records because it was unable to respond to the request due to (1) the agency does not maintain the requested record, or (2) the request requires the creation of a summary or compilation of information that is not readily retrievable. **If an agency is not providing records because it is unable to respond to a request, then do NOT also check Column P or Q showing that the request was denied in whole or in part due to claimed exceptions from disclosure**. (See Example 4.) Also, please do **not** check this cell to indicate that the agency could not **initially** respond to the request and had to seek clarification from the requester – check Column J instead. Finally, if the agency could not initially respond to the request and the requester failed to provide clarification, then the request can be deemed abandoned and Column T should be checked.

<u>Column S, Requester Withdrew?</u>: Enter only one "x" if the requester voluntarily withdrew the request. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total.

<u>Column T, Requester Abandoned/Failed to Pay?</u>: Enter only one "x" if the requester has abandoned the request through inaction, failure to provide initial clarification of the request, or failure to pay all required fees and costs. Improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in the column total.

The requester may be presumed to have abandoned the request if the requester does not answer within 20 business days of (1) the agency's notice seeking initial clarification of the request or payment of fees, or (2) the date that the agency made the record available if reasonable notice thereof had been given to the requester. (See Example 3.) The completion date would be the date that the agency's notice was sent.

Note that if a requester fails to pay fees from previous record requests, including abandoned requests, OIP's rules allow the agency to require prepayment of all outstanding fees that the requester had agreed to pay for services previously rendered by the agency before releasing any records in a subsequent request. H.A.R. Sec. 2-71-19(b)(3).

Column U, Lawsuit Filed Against Agency?: Enter only one "x" if a lawsuit has been filed against the agency because of a dispute over the agency's response to the record request. **This column may be checked in addition to checking one of Columns O through T.** However, improperly entering more than one "x" or another letter, number, word, or symbol in the cell will result in the entry not being counted in Column U's total. (See Example 4.)

PART 3: FEES AND COSTS

SEARCH, REVIEW, AND SEGREGATION (SRS) FEES: This section helps the agency to keep track of its SRS time and will automatically calculate the SRS fees that may be charged for government record requests made under Part II of the UIPA. For those needing to be refreshed as to the UIPA's requirements, an overview of SRS fees is provided below. More comprehensive training videos and guides are available at oip.hawaii.gov/training/.

When an agency has already made a good faith estimate of its SRS fees and will require prepayment of the fees, OIP recommends that the agency receive prepayment before conducting its actual search, review, and segregation work, in order to avoid wasted effort if the requester chooses to narrow or abandon the request.

SEARCH: To locate and determine if the agency "maintains" the requested record in its physical possession, or if the record is with another party but under the agency's administrative control. OIP's administrative rules allow search fees to be charged at **$2.50 per fifteen minutes or fraction thereof**, i.e., $10 per hour. § 2-71-31(a)(1), H.A.R.

REVIEW: To examine a record in order to determine which portions, if any, may be exempt from disclosure. "Review" does not include the time spent by the agency or another person (e.g., attorney) to resolve issues of general law or policy regarding the applicability of exceptions to disclosure. OIP's administrative rules allow review fees to be charged at **$5.00 per fifteen minutes or fraction thereof**, i.e., $20 per hour. § 2-71-31(a)(1), H.A.R.

SEGREGATION: To prepare the record for disclosure by redacting portions exempt from disclosure. Segregation must be done in a way that makes it reasonably apparent that information has been deleted from the record, *e.g.*, black out, not white out, redactions, or use "xxx" in place of social security numbers or telephone numbers. An agency shall not replace information that has been segregated with information or text that did not appear in the original record. OIP's administrative rules allow segregation fees to be charged at **$5.00 per fifteen minutes or fraction thereof**, i.e., $20 per hour. § 2-71-31(a)(1), H.A.R.

PERSONAL RECORDS: OIP's administrative **rules currently do not permit agencies to charge SRS fees for responding to requests for personal records** made under Part III of the UIPA. See instructions under Columns F and AD for definitions of personal record requests. **Copying and delivery costs, however, may be charged for personal record requests,** as authorized by HRS § 92-21. Copying and delivery costs are **not subject to the fee waivers for SRS fees.**

Even if a record is a personal record for which SRS fees may not be charged, the agency may still have to review that record and segregate information that is subject to a UIPA exception. Therefore, **please log all search, review, and segregation time spent to fulfill personal records requests,** so that this data will be available when OIP considers changes to its administrative rules or in case the agency needs the data to support its personnel and budget requests. If the request was properly marked as being a personal records request in Column F, the Log will automatically subtract the SRS fees (see Column AD) from the amount that the agency may charge the requester (see Column AE). The Log will also automatically highlight in purple the corresponding cells in Columns AB and AC to remind the agency to not grant a fee waiver for personal records requests. See Example 2.

Because OIP's rules allow fees based on 15-minute intervals or any fraction thereof, please **enter all times in these columns in 15-minute intervals: .25** (for 15 minutes), **.50** (for 30 minutes), **.75** (for 45 minutes), **1.0** (for one hour, 2.0 for two hours, etc.). Therefore, all of the column totals in this section should end in .25, .50, .75, or zeroes and there should be no data entries ending in .11, .12, .13, .14, .15, .16, .17, .18, .19, .20, .40, .60, .70, etc.

Also, be careful to use a period, and not a comma, when entering decimals. Otherwise, the amount will not be counted and an error message shown as #VALUE! will appear in Column Y and later columns.

<u>**Column V, Actual Search Hours**</u>: Enter the actual time, and **not less than .25** (<u>i.e.</u>, 15 minutes), spent to search for and copy the requested record, which is typically done by clerical staff. **Enter the time in 15-minute intervals**: ".25" equals 15 minutes; ".50" equals 30 minutes; ".75" equals 45 minutes; "1.0" equals one hour.

<u>**Column W, Actual Review/Segregation Hours**</u>: Enter the actual time spent to review and/or segregate the requested record, which is typically done by managers, supervisors, attorneys, or professional staff. Do not include attorneys' time for legal research in this column, as it will be separately entered in Column X. **Enter the time in 15-minute intervals**: ".25" equals 15 minutes; ".50" equals 30 minutes; ".75" equals 45 minutes; "1.0" equals one hour.

<u>**Column X, Actual Legal Review Hours**</u>: Although an agency **cannot charge for attorneys' time to research** possible exemptions from disclosure or to determine the propriety of the agency's response, please separately enter the actual time spent by an attorney for such legal review purposes. **Enter the time in 15-minute intervals**: ".25" equals 15 minutes; ".50" equals 30 minutes; ".75" equals 45 minutes; "1.0" equals one hour.

<u>**Column Y, Total Actual SRS and Legal Review Hours**</u>: This column is highlighted because the totals are **automatically calculated**, based on the hours entered for SRS times in Columns V, W, and X.

Column Z, Total GROSS SRS Fees Incurred: This column is highlighted because the total gross SRS fees (excluding legal review hours, personal records, and fee waivers) will be **automatically calculated**, based on the hours entered for SRS times in Columns V and W. This is not the amount that may actually be charged by an agency.

The orange "Average" cell Z11 calculates the average gross SRS fees incurred per case, excluding personal records since no SRS fees may be charged for such requests.

Column AA, Additional Response Fees Incurred But Not Chargeable: There may be times when an agency incurs additional fees to respond to a request, but these fees cannot be recovered by the agency under the UIPA and OIP's rules. For example, the agency may incur, but cannot charge for, special counsel's legal fees to defend a lawsuit brought by a requester to compel disclosure. For statistical purposes, the agency should estimate and list such unrecoverable fees in this column. (See Example 4.)

Column AB, Minus $30 Fee Waiver: Under OIP's administrative rules, the first $30 in SRS fees (not copying/delivery costs) must generally be waived by an agency for government record requests. § 2-71-31(a), H.A.R. If a public interest fee waiver applies, there is a $60 fee waiver instead. **Enter as a negative number "-30"** in this cell if the $30 fee waiver applies, and the Log will show it in red as "**(30.00)**." **Do not enter the $30 fee waiver if this cell is highlighted in purple as a personal record request** (Example 2), **or if the $60 public interest fee waiver is granted** (Example 4). Because there should be only one fee waiver entered per request, the same row should not have entries for both ($30.00) and ($60.00).

Although the waiver is entered by the agency as a negative dollar amount so that fees can be properly calculated in later columns, the Column AB "total" highlighted in yellow (cell AB10) will calculate the total number of $30 fee waivers granted by the agency. The "total" in cell AB10 should be a positive whole number (no fraction). **In Column AB, there should be no positive numbers in black; only "(30.00)" in red should be showing in this column. If there are any positive black numbers, they must be corrected, or the total in cell AC10 will be erroneous.**

Column AC, Minus $60 Fee Waiver: The agency must grant the **$60 public interest waiver** of SRS fees (not copying/delivery costs) for a government record request when (1) the request for such waiver is supported by a statement of facts, including the requester's identity, and (2) the agency finds that the waiver would be in the public interest. § 2-71-32 (a) H.A.R. A $60 public interest fee waiver is in the public interest when (1) the requested record pertains to an agency's operation or activities (but the record's relative importance to the public is not applicable in applying the waiver); (2) the record is not readily available in the public domain; and (3) the requester has the primary intention and actual ability to widely disseminate information from the government record to the general public at large. § 2-71-32 (b) H.A.R. **Enter as a negative number "-60"** in this cell if the public interest fee waiver is granted by the agency, and the Log will show it in red as "**(60.00)**." (See Example 4.) **Do not enter the $60 fee waiver if this cell is highlighted in purple as a personal record request** (see Example 2), **or if the $30 fee waiver is granted** (see Examples 1 and 3).

Although the waiver is entered as a negative dollar amount so that fees can be properly calculated in later columns, the Column AC "total" highlighted in yellow (cell AC10) will calculate the total number of $60 fee waivers granted by the agency. The total in cell AC 10 should be a positive whole number (no fraction). **In Column AC, there should be no positive numbers in black; only "(60.00)" in red should be showing in this column. If there are any positive black numbers, they must be corrected, or the total in cell AC10 will be erroneous.**

Column AD, Fees for Personal Records: **Automatically calculated.** Because individuals may NOT be charged SRS fees when requesting their accessible personal records under Part III of the UIPA, the amount of SRS incurred fees that was automatically calculated in Column Z will be automatically entered as a negative number in Column AD and will be subtracted from the net SRS fees chargeable in Column AE. **For this calculation to work, the agency must properly identify a personal records request by marking an "x" in Column F. A negative number in Column AD does not mean that the requester is entitled to a refund.**

The Column AD "total" highlighted in yellow (cell AD10) will automatically calculate the total dollar amount of SRS fees for personal record requests that may not be charged by the agency. The total in cell AD10 should be a negative dollar amount.

Column AE, Total NET SRS Fees Chargeable: This column is highlighted because the total net SRS fee (after waivers or personal record amounts) that may be charged by an agency will be **automatically calculated**, based on the hours entered by the agency for SRS times. Note that Column AE is not the total amount that is properly chargeable, as it does not include costs; see Column AI for total net fees and costs that are properly chargeable. **Note, too, that a negative number in this column does not mean that a refund is due.** If there is a negative amount, it is probably because the SRS fees amounted to less than the $30 or $60 fee waiver (Column AB or AC).

The Column AE "total" highlighted in yellow (cell AE10) adds all positive dollar amounts that the agency may properly charge for SRS fees, and it excludes negative dollar amounts that the agencies cannot charge. Thus, the yellow highlighted **"total" in cell AE10 should result in a positive dollar amount that the agency could properly charge for SRS fees.**

The orange "Average" cell AE11 calculates the average net SRS fees chargeable per case, excluding personal record requests (for which such fees may not be charged). This calculation does not give the average for every request made or completed, because it does not include cases in which no fees are chargeable.

COPY/DELIVERY COSTS:

In addition to SRS fees, OIP's administrative rules allow agencies to recover "other lawful fees." § 2-71-19(a)(2) H.A.R. For instance, section 92-21, Hawaii Revised Statutes, authorizes agencies to recover costs for copying (at not less than five cents per page) records requested by the public. **These copying costs are determined by each agency and are separate from the SRS fees described above.** Costs directly incurred by the agency in responding to a request, such as for postage, blank CDs or other media, or for third-party services to copy a specialized type of record (such as a videotape or blueprints), would also be considered "other lawful fees."

OIP interprets “other lawful fees” to allow a charge per page to scan records not already in electronic form if the requester wants the record to be delivered electronically or by fax. With respect to non-paper records, the agency may charge the requester for the cost of blank CDs, videos, tapes, delivery boxes, and other special materials needed to make or send a copy of the record; and where the agency lacks the necessary equipment to copy a specialized type of record (such as a videotape), the agency may charge the requester for the cost of reproduction by a third-party service. If a printed-out copy of an electronic record must be made in order to mail or fax a physical copy to the requester as requested, then the agency may charge the requester for the cost of such copy. **<u>But if a copy must be made for the agency’s internal use to redact and segregate the record, the cost of this copy cannot be charged to the requester because it is currently considered by OIP to be a part of the SRS process, not a copying or delivery cost. Only the cost of the copy provided to the requester may be charged as a copying cost under current OIP rules.</u>**

Note that copying and delivery <u>costs are not subject to the SRS fee waivers</u> in Columns AB and AC.

<u>Column AF, GROSS Copy/Delivery Costs that Agency Incurred</u>: Enter **all costs incurred** to segregate, copy, and deliver the record to the requester, **including any extra copying costs incurred for internal use to redact and segregate the record**. The gross copying/delivery costs will always be greater than or equal to the net costs.

The orange “Average” cell AF11 calculates the average gross copying and delivery costs <u>per case in which such costs were incurred.</u> This calculation is not the average gross copying and delivery costs for every requeste made or completed, because it does not include cases in which no copying or delivery costs were incurred.

<u>Column AG, NET Copy/Delivery Costs Chargeable to Requester</u>: Enter **only the costs that OIP allows to be charged** for copying, materials, and delivery of the requested record. **Do not include the cost of any extra copies made for internal use in redacting and segregating the record.** The net copying/delivery costs should always be less than or equal to the gross costs.

The orange “Average” cell AF11 calculates the average net copying and delivery costs <u>per case in which such costs were incurred.</u> This calculation is not the average net copying and delivery costs for every request made or completed, because it does not include cases in which no copying or delivery costs were incurred.

TOTAL FEES AND COSTS:

Based on the agency’s input of the time to search, review, and segregate (including any waivers) and the costs of copying, the Log will **automatically calculate** the amounts in columns AI, AJ, and AK. **<u>Column AH is the only column that the agency must fill in this section</u>, and is the agency’s last entry in the Log.** Note that the amount that it actually charged the requester may be less than the properly chargeable amount that has been automatically calculated in Column AI.

This section is divided into two parts showing totals for (1) ALL requests and (2) COMPLEX requests only. Totals for **non**complex requests can be calculated by manually subtracting the complex amounts from the amounts for all requests.

Column AH, Total Fees and Costs Actually Paid by Requesters for All Requests: **For all requests**, enter the **total** amount of SRS fees and copying, materials, and delivery charges that the requester **actually paid**, which may be less than what the agency was entitled to charge in Column AI. **The amount paid per Column AH should not exceed the amount that can be charged per Column AI**. If the agency did not charge the requester for any SRS fees or copying/delivery costs, then enter a zero. **This is the last column requiring an entry by the agency.** The remaining columns are automatically calculated by the Log.

The orange highlighted cell AH11 calculates the average amount of fees and costs per case in which requesters actually paid an amount. This calculation is not the average paid by the requester in every request made or completed, because it does not include cases in which no fees or costs were charged to or paid by requesters.

For ALL Requests:

Column AI, Total NET Fees and Costs Chargeable for All Requests: This amount will be **automatically calculated** based on the agency's data entries. **This is the amount that the agency may charge the requester for allowable SRS fees and copying/delivery costs** for ALL types of requests, including complex requests.

The yellow highlighted "Totals" cell AI10 adds all positive numbers and provides the total amount that the agency can properly charge for net fees and costs for ALL types of record requests, including complex requests.

The orange highlighted "Averages" cell AI11 provides the average net fees and costs chargeable per case in which such fees and costs may be charged by the agency. This calculation is not the average chargeable in every request made or completed, because it does not include cases in which no fees or costs could be charged by the agency.

Column AJ, Total GROSS Fees and Costs Agency Incurred for All Requests: This amount will be **automatically calculated** and is for statistical purposes only. The yellow highlighted "total" amount in cell AJ10 adds up all properly chargeable SRS fees and costs with the unrecoverable fees and costs to give the total amount that an agency incurs to fulfill ALL record requests, including complex requests, and excluding personal record requests.

The orange highlighted "Averages" cell AJ11 provides the average total gross fees and costs per case in which such fees and costs were incurred by the agency. This calculation is not the average for every request made or completed, because it does not include cases in which no fees or costs were incurred by the agency.

Column AK, Total GROSS Fees & Costs Incurred But Not Charged for All Requests: This amount will be **automatically calculated** and is for statistical purposes only. The yellow highlighted "total" amount in cell AK10 is calculated by subtracting the total net fees and costs that requesters actually paid (Column AH) from the total gross fees and costs that the agency incurred (Column AJ) to give the total amount that an agency could not charge or recover (Column AK) for ALL requests, including complex requests, and excluding personal record requests.

The orange highlighted "Averages" cell AK11 provides the average total gross fees and costs per case in which such fees and costs were incurred but not charged by the agency. This calculation is not the average for every request made or completed, because it does not include cases in which no fees or costs were incurred or charged by the agency.

For COMPLEX Requests: Similar to Columns AI through AK described above, **Columns AL through AO calculate fees and costs in complex requests only.**

Column AL, Total NET Fees & Costs Actually Paid for Complex Requests: This amount is **automatically calculated**, based on the agency's data entries in Columns AH (amount requesters actually paid) and K (complex requests). The yellow highlighted "total" amount in cell AL10 shows the **total** amount of SRS fees and copying, materials, and delivery charges that the requester actually paid **for complex record requests only.**

Column AM, Total NET Fees and Costs Chargeable for Complex Requests: This amount will be **automatically calculated**. The yellow highlighted "total" amount in cell AM10 calculates the total amount that the agency may charge requesters for allowable SRS fees and copying/delivery costs **for complex record requests only**.

Column AN, Total GROSS Fees and Costs Agency Incurred for Complex Requests: This amount will be **automatically calculated** and is for statistical purposes only. The yellow highlighted "total" amount in Cell AN10 adds all properly chargeable SRS fees and costs with the unrecoverable fees and costs to give the total amount that an agency incurs to fulfill **complex record requests only**.

Column AO, Total GROSS Fees & Costs Incurred But Not Charged for Complex Requests: This amount will be **automatically calculated** and is for statistical purposes only. The yellow highlighted "total" amount in cell AO10 is calculated by subtracting the total net fees and costs that requesters actually paid (Column AH) from the total gross fees and costs that the agency actually incurred (Column AJ) to give the total amount that an agency could not charge or recover (Column AK) for ALL requests, including complex requests.

PART 4: TIME TO RESPOND

The last 12 columns of the Log (AP through BA) have been added to provide statistical information on how many days it takes to complete record requests and how much time is incurred by the agency in doing so. **Agencies need not enter any data in Part 4**, but can use the results to better manage their handling of record requests.

DAYS TO COMPLETE REQUESTS:

<u>Column AP, Number of Workdays to Complete All Requests</u>: The Log will automatically enter the number of workdays it took to complete all requests (from Column N). There should be no zeroes or negative numbers in Column AP.

The yellow highlighted "Total" in cell AP10 calculates the **total** number of days that the agency takes to complete all requests. The orange highlighted "Average" in cell AP11 calculates the **average** number of days that the agency took to complete each request.

<u>Column AQ, Number of Workdays to Complete Complex Requests</u>: The Log will automatically enter the number of workdays it took to complete a request (from Column AP), only if it was a complex request (as identified by one "x" in Column K). There should be no zeroes or negative numbers in Column AQ.

The yellow highlighted "Total" in cell AQ10 calculates the **total** number of days that the agency takes to complete complex requests. The orange highlighted "Average" in cell AQ11 calculates the **average** number of days that the agency took to complete each complex request.

<u>Column AR, Number of Workdays to Complete Noncomplex Requests</u>: The Log will automatically enter the number of workdays it took to complete a request (from Column AP), only if it is <u>not</u> a complex request (as identified by a blank in Column K) or a personal record request (identified by an "x" in Column F). There should be no zeroes or negative numbers in Column AR.

The yellow highlighted "Total" in cell AR10 calculates the **total** number of days that the agency takes to complete noncomplex requests. The orange highlighted "Average" in cell AR11 calculates the **average** number of days that the agency took to complete each noncomplex request.

<u>Column AS, Number of Workdays to Complete Personal Record Requests</u>: For personal record requests, the Log will automatically enter the number of workdays it took to complete each request (from Column AP). There should be no zeroes or negative numbers in Column AS.

The yellow highlighted "Total" in cell AS10 calculates the **total** number of days that the agency takes to complete personal record requests. The orange highlighted "Average" in cell AP11 calculates the **average** number of days that the agency took to complete each personal record request.

SEARCH, REVIEW & SEGREGATION HOURS INCURRED:

<u>Search Hours:</u>

<u>Column AT, Number of Search Hours Incurred for All Requests</u>: The Log will automatically enter the number of search hours incurred by the agency to respond to all requests from Column V. There should be no zeroes or negative numbers in Column AT.

The yellow highlighted "Total" in cell AT10 calculates the **total** number of search hours that the agency incurred to respond to all requests. The orange highlighted "Average" in cell AT11 calculates the **average** number of search hours that the agency took to respond to each request, whether pending or completed.

<u>**Column AU, Number of Search Hours Incurred for Complex Requests**</u>: The Log will automatically enter the number of search hours incurred by the agency to respond to only complex requests based on data entered in Columns K and AT.

The yellow highlighted "Total" in cell AU10 calculates the **total** number of search hours that the agency incurred to respond to all complex requests. The orange highlighted "Average" in cell AU11 calculates the **average** number of search hours that the agency took to respond to each complex request, whether pending or completed.

<u>**Column AV, Number of Search Hours Incurred for Noncomplex, Nonpersonal Record Requests**</u>: The Log will automatically enter the number of search hours incurred by the agency to respond to only noncomplex, nonpersonal record requests based on data entered in Columns F, K, and AT.

The yellow highlighted "Total" in cell AV10 calculates the **total** number of search hours that the agency incurred to respond to all noncomplex, nonpersonal record requests. The orange highlighted "Average" in cell AV11 calculates the **average** number of search hours that the agency took to respond to each noncomplex, nonpersonal record request, whether pending or completed.

<u>**Column AW, Number of Search Hours Incurred for Personal Record Requests**</u>: The Log will automatically enter the number of search hours incurred by the agency to respond to only personal record requests based on data entered in Columns F and AT.

The yellow highlighted "Total" in cell AW10 calculates the **total** number of search hours that the agency incurred to respond to all personal record requests. The orange highlighted "Average" in cell AW11 calculates the **average** number of search hours that the agency took to respond to each personal record request, whether pending or completed.

<u>Review and Segregation Hours:</u>

<u>**Column AX, Number of Review and Segregation Hours Incurred for All Requests**</u>: The Log will automatically enter the number of review and segregation hours incurred by the agency to respond to all requests from Column W. There should be no zeroes or negative numbers in Column AX.

The yellow highlighted "Total" in cell AX10 calculates the **total** number of review and segregation hours that the agency incurred to respond to all requests. The orange highlighted "Average" in cell AX11 calculates the **average** number of review and segregation hours that the agency took to respond to each request, whether pending or completed.

<u>**Column AY, Number of Review and Segregation Hours Incurred for Complex Requests**</u>: The Log will automatically enter the number of review and segregation hours incurred by the agency to respond to only complex requests based on data entered in Columns K and AX.

The yellow highlighted "Total" in cell AY10 calculates the **total** number of review and segregation hours that the agency incurred to respond to all complex requests. The orange highlighted "Average" in cell AY11 calculates the **average** number of review and segregation hours that the agency took to respond to each complex request, whether pending or completed.

Column AZ, Number of Review and Segregation Hours Incurred for Noncomplex, Nonpersonal Record Requests: The Log will automatically enter the number of review and segregation hours incurred by the agency to respond to only noncomplex, nonpersonal record requests based on data entered in Columns F, K, and AX.

The yellow highlighted "Total" in cell AZ10 calculates the **total** number of review and segregation hours that the agency incurred to respond to all noncomplex, nonpersonal record requests. The orange highlighted "Average" in cell AZ11 calculates the **average** number of review and segregation hours that the agency took to respond to each noncomplex, nonpersonal record request, whether pending or completed.

Column BA, Number of Review and Segregation Hours Incurred for Personal Record Requests: The Log will automatically enter the number of review and segregation hours incurred by the agency to respond to only personal record requests based on data entered in Columns F and AX.

The yellow highlighted "Total" in cell BA10 calculates the **total** number of review and segregation hours that the agency incurred to respond to all personal record requests. The orange highlighted "Average" in cell BA11 calculates the **average** number of review and segregation hours that the agency took to respond to each personal record request, whether pending or completed.

Lastly, **Columns BB on** are reserved for department and agency identifiers for the drop-down menus, and should not be altered or deleted.